

**MASSACHUSETTS SIP
STEERING COMMITTEE
Meeting Summary
January 5, 2006**

In Attendance:

Bob Frey, Executive Office of Transportation
Howard Bernstein, Department of Energy Resources
Carl Spector, City of Boston
Don DiCristofaro, Blue Sky Environmental
Eloise Lawrence, Conservation Law Foundation
John Quinn, Mass Petroleum Council
Pat Stanton, Conservations Services Group
Paula Hamel, Dominion
Richard Burkhart, EPA Region 1
Rich Rothstein, KM CHNG Environmental
Stephanie Lovejoy, Conservation Services Group
Wig Zamore, STEP, MVTF

MassDEP Staff:

Eileen Hiney
Nicholas Bianco
Ken Santlal
Richard Fields
Steve Dennis

[Please note that all materials that were distributed or presented at the January 5, 2006 meeting can be viewed at <http://www.mass.gov/dep/public/committee/daqcpu11.htm>]

8-Hour Ozone Standard SIP Planning Update

Eileen Hiney said that the regional ozone attainment planning process that is being coordinated through the Ozone Transport Commission (OTC) is continuing. An important component of that process is modeling; every non-attainment area must submit an attainment demonstration SIP that includes a modeled demonstration of its air quality status as of its attainment year.

- **Modeling**

Steve Dennis provided an overview of the joint OTC-MANE-VU air quality modeling efforts related to 8-hr ozone, PM 2.5, and regional haze requirements. At this point, the OTC modeling committee has all of the necessary emission files, including data from MANE-VU states and Canada. For ozone attainment purposes, the model will assess the impact that “on-the-books” and “on-the-way” state and federal control measures, including EPA’s Clean Air Interstate Rule (CAIR), will have on air quality in 2009. New York Department of Environmental Quality staff is conducting the CMAQ model runs and hopes to have results in mid-January. These model runs should give some indication of how close the various non-attainment areas in the OTC region will be to meeting the ozone standards by the attainment deadlines.

- **Control strategies review**

Eileen Hiney reported that the OTC commissioners have asked OTC staff and committees to assess possible control strategies that would achieve additional VOC and NOx controls. The

OTC has hired a consultant to analyze what level of reductions various source sectors might be able to achieve by 2009 and at what estimated cost per ton of reductions. The strategies being examined are listed on the handout titled "Status Summary for OTC Control Measures Analysis."

A new collaborative process between the OTC and a number of Mid-West states has been initiated at the commissioner level. Like the OTC, the Mid-West states are currently going through the process of determining what control measures beyond CAIR will be needed to attain the ozone and fine particle (PM_{2.5}) standards in that region. The OTC and Mid-West states are discussing a number of strategies that might be pursued jointly including a cleaner gasoline (RFG) for the entire region, additional NO_x controls on large boilers and reduced VOCs in consumer products. The involved states are meeting again in February. A State Collaborative Meeting Summary, dated December 9, 2005, was distributed.

Phase 2 of 8-hour ozone standard implementation rule

Rich Burkhart, EPA Region 1 staff, made a presentation on the contents of Phase 2 of EPA's final 8-hour ozone standard implementation rule. Phase 1 was issued in April 2004; it addressed the classification and designation of areas as well as revocation of the 1-hour standard. Phase 2 establishes compliance requirements and a 3-6 year compliance timeframe.

As a "moderate" non-attainment area, Massachusetts is required to demonstrate attainment in June of 2010. However, because this is in the middle of the ozone season, attainment must be shown one year earlier. Emission reductions must be in place by May of 2009, and attainment must be demonstrated by the end of 2009.

The Phase II regulations require submittal of Reasonably Available Control Technology (RACT) SIPs by September 15, 2006. Areas like Massachusetts that adopted RACT controls under the 1-hour standard, will need to assess whether what was previously adopted as RACT still constitutes RACT. If it is determined that new RACT controls are needed, facilities must implement RACT within 30 months after RACT SIPs are due – no later than May 1, 2009.

Areas that have more than five years to come into attainment (including Massachusetts) must show a 15% reduction in their emissions of NO_x and VOCs between 2002 and 2009. New England states should have little difficulty with this largely due to reductions in mobile source emissions as new cars replace older, dirtier vehicles.

Attainment demonstration SIPs must show that states have adopted all Reasonably Available Control Measures (RACM). EPA will be looking very closely at RACM this time around as the agency was sued on RACM issues under the 1-hour ozone SIPs.

Regional Haze SIP planning

Eileen noted that the last discussion of EPA's 1999 Regional Haze Rule at a SIP Steering Meeting took place in April 2004 and that planning to meet the requirements of the Rule has been ongoing since then.

Steve reviewed the requirements of the Regional Haze Rule, which aims to achieve natural background conditions in Class 1 areas (certain federal parks and wilderness areas) by 2064.

The rule mandates application of BART (Best Available Retrofit Technology) controls for major stationary sources constructed between 1962-77 time frame (sources that were otherwise exempted from Clean Air Act control provisions).

Massachusetts does not have any Class 1 area but it is a "source state." As such, it must establish Best Achievable Retrofit Technology (BART) controls for sources subject to BART, develop a long-term strategy and help achieve the reasonable progress goals set by Class 1 states. MANE-VU is finalizing the BART eligible source list for each state and will use the CALPUFF model to determine impacts on Class I areas.

The BART analysis begins by determining which eligible sources contribute to visibility impairment. MANE-VU is recommending that all BART-eligible sources be subject to BART. The alternative would be to model all sources and prove which ones had a significant contribution to downwind Class 1 areas. Eligible BART sources must:

- Identify all possible retrofits;
- Eliminate infeasible options;
- Evaluate control effectiveness and evaluate impacts; and
- Evaluate visibility impacts.

The first Regional Haze SIP is due December 17, 2007. BART controls must be in place between 2011 and 2013.

January 31 stakeholder meeting - CAIR/BART/RACT issues

On January 31, DEP will host a stakeholder meeting to discuss SIP requirements as they relate to the 8-Hour Ozone, Regional Haze and CAIR rules. Invitees include facilities with: BART sources, Institutional, Commercial and Industrial (ICI) boilers, and electric generating units (EGUs). Eileen referred to a handout, "Ozone, Regional Haze and CAIR Milestones" that will be distributed at the stakeholder meeting and asked the Committee to review it and provide comments to her before 1/31.

EPA's proposed PM 2.5 standard revision

Alison Simcox, EPA Region 1 staff, made a presentation on EPA's proposal to revise the National Ambient Air Quality Standards for PM; the regulatory proposal was issued December 20th. She noted that under the current PM 2.5 standard, which was adopted in 1997, there are no PM2.5 non-attainment areas in Massachusetts.

The regulatory proposal includes standards for fine particles 2.5 micrometers in diameter and smaller (PM2.5) and "inhalable coarse" particles (particles between 2.5 and 10 micrometers (PM10-2.5)). The existing PM10 standard would be revoked under the proposal.

The proposed PM2.5 standards are:

- Annual – 15 ug/m³, annual arithmetic mean (3 years) – (same as current standard).
- 24-Hour – 35 ug/m³, 24 hour average over a 3 year period - (current is 65ug/m³).

The proposed PM_{10-2.5} standards are:

- Annual – none
- 24-Hour – 70 ug/m³

The PM_{10-2.5} standard focuses on urban areas. According to EPA, the toxicological evidence suggests that the main PM_{10-2.5} problems can be traced to urban air toxics. However, as EPA admits, this determination is highly controversial.

Under the proposed tighter 24-hour standard, Springfield might be classified non-attainment based on current ambient PM levels. However, EPA models suggest that the implementation of CAIR will result in all regions in New England attaining the PM standards.

EPA must finalize the proposal by September 27, 2006. Final attainment designations are likely to be made in November 2009 based on 2004-2006 monitored data with SIPs due in 2013.

In a separate but related action, EPA is proposing amendments to its national air quality monitoring requirements, including those for monitoring particle pollution.

Regulation update: Proposed CO₂ provisions of 310 CMR 7.29

In December 2005, MassDEP proposed regulations to reduce, avoid or sequester emissions of greenhouse gases and to create a crediting process for these projects for purposes of compliance with 310 CMR 7.29, MassDEP's 2001 power plant regulation. Copies of the new rules and the accompanying Technical Support Document can be found on the MassDEP website. Public hearings have been announced, however all hearings except the hearing scheduled at the Boston DEP office are being rescheduled.